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September 5, 2003

**VIA ELECTRONIC FILING**

The Honorable William D. Quarles  
United States District Court for  
the District of Maryland  
Garmatz Courthouse – Room 310  
101 W. Lombard Street  
Baltimore, Maryland 21201

Re: *Ajilon, LLC v. Softsol Resources, Inc.*  
In the United States District Court for  
the District of Maryland (Northern Division)  
Civil Action No. WDQ-02-4075

Dear Judge Quarles:

In accordance with the Court's March 24, 2003 Scheduling Order, I am submitting this Status Report to you. I am unable to submit a Joint Status Report in light of the serious discovery issues discussed below.

Discovery is not yet complete. Plaintiff and Counter-Defendant Ajilon, LLC ("Ajilon"), filed a Motion to Compel, demanding that Defendant and Counter-Plaintiff Softsol Resources, Inc. ("Softsol"), supplement its Answers to Interrogatories, file a Response to Ajilon's Request for Production of Documents, and provide documents to Ajilon. Softsol did not respond in writing to Ajilon's motion; instead promising, as it has for weeks, that it would supplement its Answers to Interrogatories and agree to exchange documents at some time in the near future. It was not until today that Ajilon received Softsol's supplemental answers to interrogatories and responses to Ajilon's request for production of documents.

Ajilon also timely noted Softsol's corporate designee deposition for today, September 5, 2003. Softsol informed Ajilon that it would not appear for that deposition late in the evening on September 3, 2003, without explanation, saying that it would be available for deposition sometime "in a few weeks." Finally, Softsol noted Ajilon's corporate designee deposition for Sunday September 7, 2003, two days beyond the discovery deadline. Softsol's failure to participate in discovery is the subject of Ajilon's Motions to Compel referenced below.



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The following motions are pending before the Court:

- (1) Ajilon's Motion to Compel (supplementation of discovery responses and production of documents); and
- (2) Ajilon's Motion to Compel Production of a Corporate Designee

Softsol has not responded to Ajilon's Motion to Compel (supplementation of discovery responses and production of documents) despite its response being overdue, and the motion is ripe for consideration. However, in light of Softsol's response today to Ajilon's discovery requests, Ajilon will not know if it needs the Court to review its Motion to Compel until it completes its review and analysis of Softsol's supplemental discovery responses.

Neither Ajilon nor Softsol has filed a dispositive motion at this time. Ajilon, however, asks this Court to keep open the possibility that such a motion may be filed after Softsol's discovery deposition is taken and it provides documents to Ajilon.

This case is scheduled to be tried before a jury. Ajilon anticipates that a trial would take 2-3 days.

Ajilon has repeatedly attempted to engage Softsol in serious settlement negotiations, to no avail.

Reference of this case to another judge of this Court for settlement purposes would be helpful and, as a result, Ajilon asks this Court to schedule a settlement conference as soon as possible, while at the same time postponing the deadline for filing dispositive motions until thirty days after such a conference.

At this time Ajilon is not willing to consent to have an U.S. Magistrate Judge conduct further trial-related proceedings in this case.

There are no other matters that Ajilon wishes to raise before this Court at this time.

Please call me if you have any questions.

Sincerely yours,

/s/

Daniel P. Moylan

DPM/dwm

cc: Chirag V. Patel, Esquire (*via electronic filing*)